

Kevin J. Curtis, WSBA No. 12085  
WINSTON & CASHATT, LAWYERS, a  
Professional Service Corporation  
601 W. Riverside, Ste. 1900  
Spokane, WA 99201  
Telephone: (509) 838-6131

Charles L. Babcock IV (*admitted pro hac vice*)  
cbabcock@jw.com  
Texas Bar No. 01479500  
William J. Stowe (*admitted pro hac vice*)  
wstowe@jw.com  
Texas Bar No. 24075124  
JACKSON WALKER L.L.P.  
1401 McKinney Street  
Suite 1900  
Houston, Texas 77010  
(713) 752-4360 (telephone)  
(713) 308-4116 (facsimile)

Attorneys for Defendants International Data  
Group, Inc., CXO Media, Inc. and Steve Ragan

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

RIVER CITY MEDIA, LLC, a Wyoming  
limited liability company, MARK  
FERRIS, an individual, MATT FERRIS,  
an individual, and AMBER PAUL, an  
individual,

No. 2:17-cv-105-SAB

Plaintiffs,

vs.

DECLARATION OF WILLIAM STOWE  
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*Winston & Cashatt*  
A PROFESSIONAL SERVICE CORPORATION  
1900 Bank of America Financial Center  
601 West Riverside  
Spokane, Washington 99201  
(509) 838-6131

1 KROMTECH ALLIANCE  
2 CORPORATION, a German corporation,  
3 CHRIS VICKERY, an individual, CXO  
4 MEDIA, INC., a Massachusetts  
5 corporation, INTERNATIONAL DATA  
6 GROUP, INC., a Massachusetts  
7 corporation, and STEVE RAGAN, an  
8 individual, and DOES 1-50,

Defendants.

DECLARATION OF WILLIAM J. STOWE  
IN SUPPORT OF CXO MEDIA, INC.'S  
RESPONSE TO PLAINTIFFS' MOTION  
TO EXTEND AMENDED PLEADINGS  
DEADLINE

Without Oral Argument  
Date: March 12, 2018  
Spokane, Washington

9 **DECLARATION OF WILLIAM STOWE**

10 1. My name is William Stowe. I am over the age of eighteen (18) and  
11 competent to make this Declaration. The facts stated herein are true and correct and  
12 based upon my personal knowledge.

13 2. I am an associate attorney with Jackson Walker L.L.P., which represents  
14 CXO Media, Inc. ("CXO"), Steve Ragan, and International Data Group, Inc. ("IDG") in  
15 this matter.

16 3. CXO and IDG served Plaintiffs' counsel with responses to, among other  
17 things, Requests for Production and Interrogatories on November 28, 2017. A true and  
18 correct copy of my email serving these responses is attached hereto as Exhibit A. True  
19 and correct copies of those responses are attached as Exhibits B and C.

20  
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23  
24 DECLARATION OF WILLIAM STOWE  
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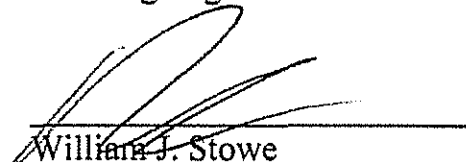
1           4.     Plaintiffs' counsel attaches to his declaration as Exhibit C an email from  
2 Plaintiffs' counsel to me dated December 28, 2017 at 10:35:23 a.m (ECF 80-3). But  
3 what Plaintiffs' counsel does not attach is my response the next day and responses that  
4 followed which led to the scheduling of a meet and confer for January 2, 2018. A true  
5 and correct copy of said responses is attached hereto as Exhibit D.  
6

7           5.     During a telephonic meet and confer, which took place on or about January  
8 2, 2018, I explained to Plaintiffs' counsel that my clients continued to object to discovery  
9 that went into matters of general jurisdiction.  
10

11          6.     Plaintiffs' counsel also fails to include an email chain involving me and him  
12 between January 3 and January 4, 2018, in which he requested an extension of the  
13 amendment deadline by 30 days after production and my response explaining why we  
14 could not agree to that. Attached as Exhibit E is a true and correct copy of his request  
15 and my response.  
16

17          7.     Contrary to his declaration, Plaintiffs' counsel did not confer with me via  
18 telephone on February 8, 2018 regarding a separate "Motion to Expedite."  
19

20          8.     I declare under penalty of perjury that the foregoing is true and correct.  
21 Executed on February 9, 2018.

22   
23 William J. Stowe  
24

DECLARATION OF WILLIAM STOWE  
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(509) 638-6131

1 I hereby certify that on February 9, 2018, I electronically filed the foregoing with  
2 the Clerk of the Court using the CM/ECF System which will send notification of such  
3 filing to the following:  
4

5 Jason E. Bernstein - [jake@newmanlaw.com](mailto:jake@newmanlaw.com)  
6 Leeor Neta (*admitted pro hac vice*) - [leeor@newmanlaw.com](mailto:leeor@newmanlaw.com)

7 Attorneys for Plaintiffs

8  
9 Christopher B. Durbin - [cdurbin@cooley.com](mailto:cdurbin@cooley.com)  
10 Matthew D. Brown (*admitted pro hac vice*) - [brownmd@cooley.com](mailto:brownmd@cooley.com)  
11 Amy M. Smith (*admitted pro hac vice*) - [amsmith@cooley.com](mailto:amsmith@cooley.com)

12 Attorneys for Defendant Kromtech Alliance Corporation

13 Edward C. Chung - [Echung@cmmlawfirm.com](mailto:Echung@cmmlawfirm.com)  
14 Attorney for Defendant Chris Vickery

15 s/Kevin J. Curtis, WSBA No. 12085  
16 WINSTON & CASHATT, LAWYERS  
17 Attorneys for Defendants International Data  
18 Group, Inc., CXO Media, Inc. and Steve Ragan  
19 601 W. Riverside, Ste. 1900  
20 Spokane, WA 99201  
21 (509) 838-6131  
22 Facsimile: (509) 838-1416  
23 E-mail Address: [kjc@winstoncashatt.com](mailto:kjc@winstoncashatt.com)  
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